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*Plaintiffs' Liaison Counsel*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

**DECLARATION OF JENNIE LEE  
ANDERSON IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
EXHIBIT TO THE DECLARATION OF  
JENNIE LEE ANDERSON IN SUPPORT  
OF PLAINTIFFS' THIRD  
CONSOLIDATED *EX PARTE*  
APPLICATION FOR APPOINTMENT  
OF GUARDIANS *AD LITEM***

This Document Relates to:

*M.C., on behalf of minor E.C. v. Meta Platforms, Inc., et al., 4:23-cv-03398*

*D.S. filed on behalf of S.C. v. Meta Platforms, Inc., et al., 4:23-cv-03402*

*B.B filed on behalf of minor R.B. v. Meta Platforms, Inc., et al., 4:23-cv-03032*

*M.W., filed on behalf of Minor G.W. v. Meta*

1       *Platforms, Inc., et al. 4:23-cv-03824*

2       *Monica Jackson, an individually and on  
behalf of her minor child M.J. v. Meta  
Platforms, Inc., et al. 4:23-cv-03774*

3  
4       *E.S. individually and on behalf of E.S. and  
J.S. individually v. Meta Platforms, Inc., et  
al. 4:23-cv-03682*

5  
6       *N.B., individually and on behalf of H.B. v.  
Meta Platforms, Inc., et al. 4:23-cv-03635*

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8       *M.H. individually and on behalf of B.H. and  
E.H., individually v. Meta Platforms Inc., et  
al. 4:23-cv-03639*

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10      *L.T. on behalf of C.A. v. Meta Platforms Inc.,  
et al. 4:23-cv-03637*

11  
12      I, Jennie Lee Anderson, do hereby declare and state as follows:

13  
14      1.       I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted  
15 to practice before the courts of the State of California and in the Northern District of California. I  
16 am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent*  
17 *Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of  
18 record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I  
19 make this declaration of my own personal knowledge and, if called as a witness, I could and  
20 would testify competently to the matters stated below.

21  
22      2.       I make this declaration in support of Plaintiffs' Administrative Motion to File  
23 Under Seal Exhibit to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Third  
24 Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Administrative  
25 Motion to Seal").

26  
27      3.       For the reasons set forth in Plaintiffs' administrative motion to seal filed on  
February 28, 2023 (ECF No. 147) and the Administrative Motion to Seal filed herewith, Plaintiffs  
28

1 seek to seal the Exhibits attached to the Declaration of Jennie Lee Anderson in Support of  
 2 Plaintiffs' Third Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*  
 3 ("Anderson Declaration").

4. True and correct copies of the following Exhibits to the Anderson Declaration  
 5 are as follows and attached hereto:

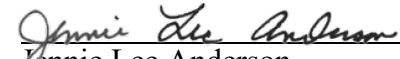
- 6 • *M.C., on behalf of minor E.C. v. Meta Platforms, Inc., et al., 4:23-cv-03398*  
 7 (Exhibit 1)
- 8 • *D.S. filed on behalf of S.C. v. Meta Platforms, Inc., et al., 4:23-cv-03402*  
 9 (Exhibit 2)
- 10 • *B.B filed on behalf of minor R.B. v. Meta Platforms, Inc., et al., 4:23-cv-03032*  
 11 (Exhibit 3)
- 12 • *M.W., filed on behalf of minor G.W. v. Meta Platforms, Inc., et al., 4:23-cv-03824*  
 13 (Exhibit 4)
- 14 • *Monica Jackson, an individually and on behalf of her minor child M.J. v. Meta*  
 15 *Platforms, Inc., et al., 4:23-cv-03774* (Exhibit 5)
- 16 • *E.S. individually and on behalf of E.S. and J.S. individually v. Meta Platforms,*  
 17 *Inc., et al., 4:23-cv-03682* (Exhibit 6)
- 18 • *N.B., individually and on behalf of H.B. v. Meta Platforms, Inc., et al., 4:23-cv-*  
 19 *03635* (Exhibit 7)
- 20 • *M.H. individually and on behalf of B.H. and E.H., individually v. Meta Platforms,*  
 21 *Inc., et al., 4:23-cv-03639* (Exhibit 8)
- 22 • *L.T. on behalf of C.A. v. Meta Platforms, Inc., et al., 4:23-cv-03637* (Exhibit 9)

23 5. Pursuant to Civil Local Rule 7-11, on June 15, 2023, I asked for, and Defendants agreed to,  
 24 a standing stipulation that the individual applications seeking appointment of guardians ad litem  
 25 in this case may be filed under seal. Liaison Counsel for Defendants also confirmed that, in so  
 26 stipulating, Defendants do not waive, and expressly reserve, their right to seek an order or orders  
 27 in the future to unseal individual applications and/or require parents who wish to proceed  
 28 pseudonymously going forward make a showing of good cause.

1 I declare under penalty of perjury pursuant to the laws of the United States of America that  
2 the foregoing is true and correct.

3  
4 Dated: August 7, 2023

Respectfully submitted,

5   
6 Jennie Lee Anderson  
Plaintiffs' Liaison Counsel

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